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June 10, 2022

By ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Seth Andrew*, **22 Cr. 32 (JPC)**

Dear Judge Cronan:

As Your Honor knows, we represent Seth Andrew in the above-captioned case. We write to respectfully request that the Court grant permission for Mr. Andrew to travel outside of his district of residence from on or about July 12 to on or about July 20. The government and Pretrial Services do not oppose this request.

Under the terms of his release, Mr. Andrew must remain within the District of Rhode Island, where he currently resides, except for attorney visits and court appearances. He is also permitted to travel to Massachusetts, Connecticut, and New York for periodic day trips, and the District of Columbia and Massachusetts for periodic overnight trips, provided that in all instances he receives prior approval from his Pretrial Services Officer.

We respectfully request that Mr. Andrew be permitted to travel with his wife and children from on or about July 12 to on or about July 20 to visit his in-laws in Bettendorf, Iowa, with an intervening trip to Gurnee, Illinois. Should the Court approve this request, Mr. Andrew and his family would fly from New York to Chicago, drive to Bettendorf, and return the same way. Mr. Andrew also would remain in close contact with his Pretrial Services Officer throughout this trip, including keeping his Pretrial Services Officer apprised of his specific itinerary.

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       We thank the Court for its consideration of this request.

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Respectfully submitted,
KRIEGER KIM & LEWIN LLP

By: _____

Edward Y. Kim
Varun A. Gumaste

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cc: AUSA Ryan B. Finkel
       U.S. Probation Officer Michelle Millan (SDNY)
       Pretrial Services Officer Dominique Jackson (SDNY)
       Pretrial Services Officer Tim Donohue (DRI)